

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**CRIMINAL NO. 3:14cr-111HTW-FKB**

**CHRISTOPHER B. EPPS**

**DEFENDANT'S MOTION FOR AMENDMENT  
OR MODIFICATION OF DETENTION**

**COMES NOW** your Defendant, Christopher B. Epps, by and through undersigned counsel, and files this his Motion for Amendment or Modification of Detention pursuant Title 18, United State Code Section 3145(B) and would respectfully show unto this Honorable Court the following, to wit:

1.

On Thursday, November 3, 2016 and Friday, November 4, 2016 this Court held a revocation proceeding with regard to a recent incident involving your defendant's violation of the terms of his release.

2.

After said hearing pursuant to Title 18, United State Code, Section 3148(B) the Court detained your defendant on November 4, 2016 and he has remained in custody since that time.

3.

Your defendant has complied with the Court's request to provide additional information as to the ownership of his residence and the source of funds for the bond money posted. Also, your defendant has recently been offered employment and will be working full-time if released.

4.

Undersigned counsel submits there are conditions and/or a combination of conditions that could reasonably assure his appearance at any/all court dates and to reasonably assure the safety of the community.

5.

Your defendant has shown he's always appeared at each and every Court proceeding, which would rebut any presumption of flight and even shown further, after being released on the State Court bond, he was at his home when the U.S. Marshal came to serve the current warrant.

6.

In rebuttal of any safety risk, the unique factors of the allegations underlying the revocation herein were specific isolated and remote and not in any way directed at the community or any person.<sup>1/</sup>

7.

Factors such as electronic-monitoring, house-arrest, curfew and/or a third party custodian could and will reasonably assure any safety concern, and assure no chance of recidivism.<sup>2/</sup>

8.

With regard to Title 18, U.S. Code Section 3 148(B)(1)(B), undersigned submits that given the Totally of Circumstances and defendant's total compliance with every single term of his release, up to this point, (which was out-of-character) and due to same, it is very likely, he would abide by any condition or combination of conditions the Court may impose.

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<sup>1/</sup> The only alleged victim was the U.S. Government who owned his old residence at this time.

<sup>2/</sup> There was no evidence of any entry into the residence nor taking of any hidden money as stated in the media plus the record shows the government seized over \$2,200,000 in assets and cash, yet claimed a max of \$1,400,000 in bribes.

**WHEREFORE, PREMISES CONSIDERED**, your Defendant, Christopher B. Epps by and through counsel, respectfully requests that this Court considers this his Motion for Amendment or Modification of Detention and after same an Order issue allowing him to be released on bond with conditions and/or a combination of conditions to reasonably assure both his appearance and safety to the community.

**Respectfully submitted**, this the 15<sup>th</sup> day of November, 2016.

Respectfully submitted,  
CHRISTOPHER B. EPPS

BY: /s/John M. Colette  
John M. Colette, Esq.,  
Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I, John M. Colette, do hereby certify that I have this day sent notice of the above and foregoing pleading via the Court's electronic filing system to all parties of record.

THIS, the 15<sup>th</sup> day of November, 2016.

**/s/John M. Colette**  
Attorney for Defendant